

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,  
HARPERCOLLINS PUBLISHERS LLC,  
JOHN WILEY & SONS, INC., and PENGUIN  
RANDOM HOUSE LLC

Plaintiffs,

v.

INTERNET ARCHIVE and DOES 1 through 5,  
inclusive

Defendants.

Case No. 1:20-CV-04160-JGK

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Civil Rule 1.3 of the Rules of the United States District Court for the Southern District of New York, I, Danae Tinelli, respectfully move this Court for an Order for admission to practice pro hac vice to appear as counsel for Plaintiffs Hachette Book Group, Inc., HarperCollins Publishers LLC, John Wiley & Sons, Inc., and Penguin Random House LLC (collectively, “Plaintiffs”) in the above-captioned action.

As set forth in my declaration, I am a member in good standing of the bars of New York and the District of Columbia. Further, there are no pending disciplinary proceedings against me in any state or federal court. As required by Local Civil Rule 1.3, certificates of good standing for me from the New York and District of Columbia Bars, issued within the past 30 days, and a proposed order are attached to this motion.

I appreciate the Court’s consideration and look forward to the opportunity to appear in this matter.

DATED: January 6, 2022  
Washington, D.C.

Respectfully submitted,

/s/ Danae Tinelli

Danae Tinelli (applicant)

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